



Transparency in Interest Representation

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This letter is to express EFPIA's support for a mandatory EU Lobby Register. Interest representation is a vital part of any healthy democracy and the European Institutions benefit from the input and technical expertise of professional lobbyists and organisations. Lobbyists come in many forms as diverse as environmental NGOs or multinational companies. Expertise is provided to policy makers on a daily basis by professional consultancies, law firms, industry associations, companies, labour unions, NGOs, think tanks, academic institutions and many other coalitions and networks.

As such we support a mandatory, robust and credible transparency regime. To achieve this, clear, effective and simplified standards for all are needed, complying with due process. As a registrant to the current EU Transparency Register, EFPIA (representing our 33 national associations and 41 leading pharmaceutical companies) is committed to professionalism in interest representation. We seek to lead by example when it comes to filing complete and accurate information on the register.

We share concerns of many other interest representatives [including Transparency International, the European Public Affairs Consultancies Association, the Council of Bars and Law Societies of Europe and the Society of European Affairs Professionals] that the inappropriate behavior of a few can discredit the entire profession.

This Commission has announced its intention to propose improvements to the Transparency Register. The pharmaceutical industry encourages the European Commission, European Parliament and the Council to view a new Inter-Institutional Agreement (IIA) as a unique opportunity for substantial, ambitious and broadly supported reform. We strongly encourage the high-level working group leading the negotiation of the IIA to make the register mandatory by:

- Putting in place an effective system **to motivate all organisations influencing EU decision-making to sign up to the EU Transparency Register**. Unregistered lobbyists and organisations should, for example, no longer be able to meet officials, organise events, and participate in hearings or expert groups.



- Ensuring that the new **Transparency Register covers all EU institutions** involved in the political decision-making process: this means a new effort is required to include the Council. Politicians and high-ranking civil servants from these institutions should no longer meet with unregistered lobbyists and organisations and should provide appropriate transparency of their meetings online.
- Whilst maintaining the aggregate nature of data submitted, designing a robust system with better legal definitions, monitoring procedures and sanctions that encourage registrants to provide accurate information. Organisations that do not comply with the rules should be sanctioned subject to due process by an independent body to rule on alleged violations and oversee an appropriate appeal procedure.

In achieving the above it is essential that further reform impose the smallest possible administrative burden on registrants and the EU institutions. This reform is both desirable and achievable and we urge all institutions involved to make clear progress.



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